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August 23, 2024

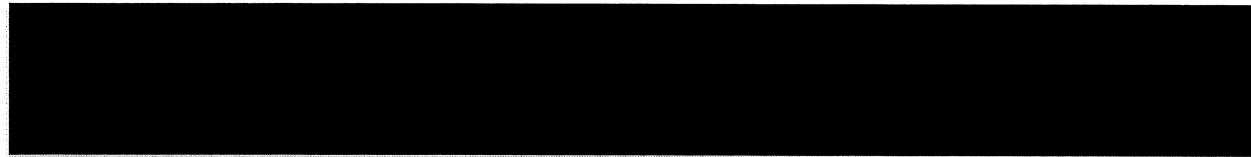
Hon. Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, New York, 10007

Re: *U.S. v. Elijah Pough*, 23 Cr. 204 (PGG)

Your Honor:

We write to request an adjournment of the Oct. 7, 2024, trial date. The government does not object to an adjournment of trial. The defense respectfully requests that the Court hold a status conference in two weeks. During that two-week period, the defense will be able to obtain a better understanding of the discovery and then relay to the Court the precise amount of time it needs for trial preparation.

Some of the reasons we are requesting an adjournment of the Oct. 7 trial date are: (1) the discovery is voluminous and includes the contents of 18 seized phones and one seized computer, 31 Instagram/Facebook accounts, and 361 jail calls of varying duration; (2) we received the discovery from the Coordinating Discovery Attorney last week and have not been able to pour through all of it and study it with Mr. Elijah Pough, who is detained at the MDC in Brooklyn; (3) both attorneys are new to the case (I was appointed July 26 and Ms. Shroff on August 8); (4) in the interim, the Government re-opened plea negotiations with Mr. Pough such that the case may result in a non-trial disposition. We are unable to culminate plea discussions as we simply do not know the facts of the case well enough to properly advise our client.



For these reasons, we respectfully request, with no objection from the Government, that the Oct. 7 trial date be adjourned and that a status conference be scheduled two weeks from today. The defense does not object to the tolling of speedy time as it is necessary to properly prepare for trial and comply with the constitutional mandate to provide effective assistance of counsel.

MEMO ENDORSED
The opposition is denied.

SO ORDERED:

Paul G. Sandef
Paul G. Gardephe, U.S.D.J.
Dated: August 26, 2024

Thank you for your time and consideration to this request.

Respectfully submitted,
/s/Leonardo M. Aldridge

/s/Sabrina Shroff